

June 17, 2019

Via ECFS

Ms. Marlene H. Dortch Secretary, Federal Communications Commission 445 12th Street SW Washington, D.C. 20554

Re: Partial Withdrawal of USTelecom Petition from WC Docket No. 18-141

Dear Ms. Dortch:

Pursuant to Section 1.59 of the Federal Communications Commission's rules, USTelecom hereby narrowly requests withdrawal of its request for forbearance from dark fiber transport unbundling requirements. The request was made as part of USTelecom's Petition for Forbearance Pursuant to 47 U.S.C. §160(c) to Accelerate Investment in Broadband and Next-Generation Networks, WC Docket No. 18-141, filed on May 4, 2018 ("Petition").¹

USTelecom seeks to withdraw this limited portion of the Petition without prejudice as to further action, including future re-filing of claims relating to dark fiber. Moreover, this withdrawal does not affect any of the Petition's other pending forbearance requests.

Please direct any questions to the undersigned.

Sincerely,

/s/ Patrick R. Halley
Patrick R. Halley
Senior Vice President, Policy & Advocacy

cc: Nirali Patel
Kris Anne Monteith
Terri Natoli

¹ See Petition for Forbearance of USTelecom – The Broadband Association, WC Docket No. 18-141, at 2, 24, 26-27 (filed May 4, 2018) ("Petition") (seeking forbearance from any "ILEC-specific unbundling and resale mandates in Section 251(c)(3) and (4) and associated Section 251 and 252 obligations," which include obligations regarding unbundled dark fiber). See also Reply Comments of USTelecom, WC Docket No. 18-141, at 15 (filed Sept. 5, 2018) (explaining that "[t]he market's nationwide competitiveness refutes claims that CLECs require access to unbundled dark fiber").